

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

2017 MAY 17 P 3:17

LEK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

HARALD MCPIKE,

Plaintiff,

v.

ZERO-GRAVITY HOLDINGS, INC. f/k/a
SPACE ADVENTURES LTD., THOMAS
SHELLEY AND ERIC ANDERSON,

Defendant.

Civil Action No.

1:17CV562-TSE/JFA

MOTION TO SEAL

Pursuant to Local Civil Rule 5(C) for the United States District Court of the Eastern District of Virginia ("Rule 5"), Plaintiff Harald McPike ("Mr. McPike" or "Plaintiff") files this motion to seal his Complaint (and Exhibit 1 to that Complaint) against Defendant Zero-Gravity Holdings, Inc. formerly known as Space Adventures Ltd. ("Space Adventures" or "SA"), Thomas Shelley ("Mr. Shelley"), and Eric Anderson ("Mr. Anderson"). Plaintiff files this motion only because his Complaint and Exhibit 1 contain information that the *Defendants* have designated as confidential. Plaintiff does not believe that anything in his Complaint or Exhibit 1 actually qualifies under applicable law to be maintained under seal, but files this motion to give the *Defendants* an opportunity to submit a response setting forth any reasons why *they* may believe the Complaint or Exhibit 1 should be maintained under seal, as contemplated by the sixth paragraph of Rule 5(C).

Dated: May 17, 2017

Respectfully submitted,

CLARE LOCKE LLP

By: 

Thomas A. Clare (VSB # 39299)

Megan L. Meier (VSB # 88720)

10 Prince Street

Alexandria, Virginia 22314

Tel.: (202) 628-7400

tom@clarelocke.com

megan@clarelocke.com

and

SEWARD & KISSEL LLP

Bruce G. Paulsen (*pro hac vice* pending)

Jeffrey M. Dine (*pro hac vice* pending)

1 Battery Park Plaza

New York, New York 10004

Tel.: (212) 574-1200

paulsen@sewkis.com

dine@sewkis.com

Attorneys for Plaintiff

Harald McPike